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2	District of Nevada			
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7	, i	DICTRICT COLUMN		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
9	UNITED STATES OF AMERICA,	Case No.: 2:21-cr-00082-GMN-EJY		
10	Plaintiff,	Stipulation for Extension of Time		
11	VS.	(Second Request)		
12	DANIELA TITO AND JACK PAUL			
13	MCLAUGHLIN, Defendants.			
14				
15	IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,			
16	United States Attorney, and Andrew W. Duncan, Assistant United States Attorney, counsel for			
17	the United States of America, Thomas F. Pitaro, counsel for defendant Daniela Tito, and			
18	James Oronoz, counsel for Defendant Jack Paul McLaughlin, that the date for the Government			
19	to file a response to the Defendant's Motion to Suppress (ECF No. 47) be extended for twenty-			
20	eight days, specifically to May 9, 2022.			
21	This stipulation is entered for the following reasons:			
22	1. The Defendant's Motion to Supp	ress was filed and served on March 7, 2022. See		
23	ECF No. 47. The Government's	response deadline is presently April 11, 2022.		
24	2. The parties are in negotiations to	resolve the case.		

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1	3. The parties need additional time to attempt to resolve the matter without		me to attempt to resolve the matter without
2		litigating pre-trial motions.	
3	4.	Government Counsel needs a	dditional time to conduct investigation and
4		research to adequately respon	d to the Defendant's motion.
5	5.	The additional time requested	I herein is not sought for purposes of delay, but to
6		allow counsel and the defenda	ants sufficient time to resolve the case.
7	6.	The additional time requested	herein is not sought for purposes of delay, but to
8		allow the Government time to	o adequately respond to the Defendant's motion.
9	7.	Trial in this matter is not sche	eduled until July 11, 2022.
10	8.	Additionally, denial of this re	quest for continuance could result in a miscarriage
11		of justice.	
12	9.	This is the second stipulation	filed herein to continue the Government's response
13		deadline.	
14	10.	The parties agree to the exten	sion of time.
15	DAT	DATED: April 7, 2022	
16	Respectfully submitted,		
17	CHRISTOPHER CHIOU		
18		g United States Attorney	
19		s/ Andrew W. Duncan	/s/ Thomas F. Pitaro
20		REW W. DUNCAN tant United States Attorney	THOMAS F. PITARO Counsel for Defendant
21			Daniela Tito
22			<u>/s/ James Oronoz</u> JAMES ORONOZ
23			Counsel for Defendant Jack Paul McLaughlin
24			

1 UNITED STATES DISTRICT COURT 2 **DISTRICT OF NEVADA** 3 * * * 4 2:21-cr-00082-GMN-EJY UNITED STATES OF AMERICA, 5 Plaintiff, 6 v. 7 DANIELA TITO AND JACK PAUL 8 MCLAUGHLIN 9 Defendants. 10 **FINDINGS OF FACT** 11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the 12 Court finds that: 13 1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. See 14 ECF No. 47. The Government's response deadline is presently April 11, 2022. 15 2. The parties are in negotiations to resolve the case. 16 3. The parties need additional time to attempt to resolve the matter without 17 litigating pre-trial motions. 18 4. Government Counsel needs additional time to conduct investigation and 19 research to adequately respond to the Defendant's motion. 20 5. The additional time requested herein is not sought for purposes of delay, but to 21 allow counsel and the defendants sufficient time to resolve the case. 22 The additional time requested herein is not sought for purposes of delay, but to 6. 23 allow the Government time to adequately respond to the Defendant's motion. 24

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1	7. Trial in this matter is not scheduled until July 11, 2022.		
2	8. Additionally, denial of this request for continuance could result in a miscarriage		
3	of justice.		
4	9. This is the second stipulation filed herein to continue the Government's response		
5	deadline.		
6	10. The parties agree to the extension of time.		
7	For all of the above-stated reasons, the ends of justice would best be served by a		
8	continuance of the Government's response deadline.		
9	CONCLUSIONS OF LAW		
10	The additional time requested herein is not sought for purposes of delay, but to allow the		
11	Government adequate time to respond to the Defendant's motion and to allow the parties to		
12	negotiate a resolution of the case. The failure to grant said continuance would likely result in a		
13	miscarriage of justice.		
14	<u>ORDER</u>		
15	IT IS THEREFORE ORDERED that the previously scheduled response deadline for		
16	the Government to respond to the Defendant's Motion to Suppress is extended until May 9,		
17	2022.		
18	DATED this 7th day of April 2022.		
19	2 .00 .0		
20	HONORABIE FLAYNA LYOUCHAH		
21	UNITED STATES MAGISTRATE JUDGE		
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23			
24			